



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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**Order Instituting Rulemaking Regarding
Policies, Procedures and Rules for the
California Solar Initiative, the Self-
Generation Incentive Program and Other
Distributed Generation Issues.**

**Rulemaking 06-03-004
(Filed March 2, 2006)**

**COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY ON THE
PROPOSED OPINION MODIFYING DECISION 06-08-028 REGARDING
INDEPENDENT PERFORMANCE MONITORING AND REPORTING
REQUIREMENTS**

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January 8, 2008

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I. INTRODUCTION

Pacific Gas and Electric Company (PG&E) wishes to thank the California Public Utilities Commission (Commission) for its thoughtful consideration of the issues surrounding performance monitoring and reporting service (PMRS) requirements and data integrity for Performance Based Incentive (PBI) payments as part of the California Solar Initiative program. PG&E supports the Commission's Proposed *Opinion Modifying Decision 06-08-028 Regarding Independent Performance Monitoring and Reporting Requirements* (Proposed Decision) with two minor modifications discussed below. PG&E reiterates its willingness to continue to work with industry stakeholders and the other Program Administrators (Pas) to refine the Performance Data Provider (PDP) proposal.

PG&E supports modifying two aspects of the Proposed Decision.

- First, PG&E requests that the proposed PDP workshop be scheduled within 60 days of the Commission adoption of the Proposed Decision. This will provide an additional 30 days, time needed to fully develop the more technical aspects of the PDP qualifications, standards, and protocols.

- Second, PG&E requests that the Commission replace the proposed interim PDP procedures in Appendix A of the Proposed Decision with individual “PA Interim PBI Processes,” provided here for PG&E in Attachment A to these comments. Attachment A is based on the document submitted by PG&E to the Energy Division in November of 2007. These interim procedures are further updated from what was submitted in November to reflect the current data handling process in PG&E’s service territory. PG&E further recommends that the Commission provide Pas the flexibility to modify these processes further as necessary, with Energy Division oversight, to respond to the needs of the California Solar Initiative (CSI) applicants and industry stakeholders and in recognition of the evolving nature of the CSI Program.

II. DISCUSSION

A. More Time is Needed to Address Technical Issues in Advance of the Proposed Commission Workshop.

On December 12, 2007, the PAs convened a workshop to further discuss the PDP proposal and identify issues and concerns from industry stakeholders. At that workshop, participants expressed support for the overall PDP proposal, but requested more information on the proposed data transfer protocols and data validation rules. At the conclusion of the workshop, the PAs proposed holding two additional workshops; one to address the data transfer protocols and another to discuss data validation rules.

PG&E requests that the timing of the Commission workshop be extended 30 additional days to allow more time to seek input from experts in the field of data transfer protocols and to further develop and test the proposed data validation rules in advance of the Commission planned workshop. PG&E requests that the Commission workshop be held 60 days from the date of Commission approval of the Proposed Decision instead of the proposed 30 days. The extra time will allow the PAs to further refine the more technical aspects of the PDP proposal and should make the proposed Commission workshop on the overall PDP requirements more effective and

productive. PG&E will work with the other PAs and industry stakeholders to schedule the planned preliminary technical workshops in advance of the Commission's workshop.

B. The Attached Interim PDP Procedures Are Out of Date and Should Be Replaced With the Individual Program Administrator Procedures.

The Interim CSI PBI Data Transfer Rules included as Appendix A of the Proposed Decision were developed in response to an Energy Division request in August 2007. At that time, PG&E had neither approved any PBI applications nor issued any PBI payments. Since August, PG&E has approved several PBI applications and has issued PBI payments to customers. As a result, PG&E has updated its interim process from what was initially reported in August. For instance, while PG&E continues to use the referenced PBI Data Report Excel spreadsheet format for reporting the performance data, data validations are not required at this time. This is in recognition of the concerns expressed by industry stakeholders and to allow more time to refine these rules.

In November 2007, Energy Division staff requested that each of the PAs provide written procedures that each is using for their respective interim PBI processes. PG&E requests that the Commission replace the now outdated Interim CSI PBI Data Transfer Rules included in Appendix A of the Proposed Decision with each individual PA's Interim PBI Processes. PG&E has provided the proposed document for PG&E in Attachment A. This document is updated to provide the most current information and procedures and is based on the document provided to the Energy Division in November, 2007.

PG&E also requests that the Proposed Decision be modified to allow these interim rules to remain flexible to enable PAs to adapt to changes in the CSI program and make improvements, with Energy Division oversight, as the PAs and PDPs each gain experience with the process.

III. CONCLUSION

PG&E greatly appreciates the opportunity to provide comments on this Proposed Decision and thanks the Commission for being responsive to the needs of the industry and to the evolving

nature of the CSI Program. PG&E fully supports the PDP concept and is committed to working with CSI stakeholders and the Commission to refine and improve upon the process.

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January 8, 2008

Attachment A

PG&E Interim PBI Process

January 8, 2007

PDP Approval Process

All Performance Data Providers (PDPs) must submit the application from the draft Instructions for Qualifying as a Performance Data Provider (PDP) for the California Solar Initiative Program (PDP Instructions) or send a letter stating their intent to provide this service and provide a contact and alternate contact for PBI data issues. PDPs must read and understand the PDP Instructions as a basis for longer-term CSI program participation.

Meter Verification Process

PG&E gathers the meter information (make, model & serial number) from the applicant. In the near future, PG&E expects this information will be included on a revised Incentive Claim Form (ICF). For the near term, PG&E is requesting this information from the applicants when the ICF is submitted. PG&E then checks this information to ensure the equipment is included on the CEC Eligible Equipment List and for conformity with Appendix B of the CSI Handbook.

Field Inspection Process

PG&E currently inspects 100% of the projects associated with PBI applications. Eventually, PG&E expects to move to random inspections once it gains more experience with PBI installations and installers.

For the interim period, the CSI field inspectors will record the meter information from the equipment installed at the site so that it can be matched against what was reported by the applicant. Eventually, PG&E's meter technicians will record the customer meter information when the bi-directional revenue meter is installed, assuming the customer's performance meter has been installed by that time. If it has not yet been installed, a CSI inspection will be required.

PDP Notification Process

Once the ICF has been completed and approved, the CSI field inspection has been completed and the meter information has been checked and approved, the system is deemed complete. At this point, PG&E will send out an Incentive Claim Approval Letter (ICAL) to each of the persons listed on the application and to the PDP.

The ICAL specifies the date on which the PDP must begin recording performance data. The PBI data reporting period will begin on midnight of the 1st or the 16th of the month following the date of the ICAL, and ends on the same date and time the following month. Subsequent data reporting periods run from midnight on the 1st or 16th of the month and follow the same ending

schedule. The PDP must provide the PBI data no later than the 5th or 20th of the following month, depending on the starting date.

Monthly PBI Data Submission

The PDP must provide monthly system performance data to PG&E in the approved PBI Data Report Excel spreadsheet format. The spreadsheet should be emailed to SolarPBI@pge.com per the established reporting cycle each month. PG&E will validate the resulting PBI payment to ensure it is within an expected range before the payment is issued.

The PDP is responsible for immediately notifying PG&E if they are unable to provide the data for any reason. PG&E will only issue PBI payments based on actual performance data.

CERTIFICATE OF SERVICE BY ELECTRONIC MAIL

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is Pacific Gas and Electric Company, Law Department B30A, Post Office Box 7442, San Francisco, CA 94120.

On the 8th day of January, 2008, I served a true copy of:

**COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY ON THE
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INDEPENDENT PERFORMANCE MONITORING AND REPORTING
REQUIREMENTS**

by electronic service to the e-mail addresses for the parties listed on the official service list for R.06-03-004.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 8th day of January 2008 at San Francisco, California.

/s/

PAMELA J. DAWSON-SMITH

**THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
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ALJ Assigned: Dorothy Duda on March 7, 2006; ALJ Assigned: Maryam Ebke on July 12, 2006

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